

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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Lauren Howie Laur,

Plaintiff,

Case No. 14 c- 27

v.

City of Mequon, et al,

Defendant.

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**Plaintiff's Proposed Voir Dire Questionnaire**

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1. Name:
2. Age:
3. Date of Birth:
4. Place of Birth:
5. Sex: ☐ Female  
☐ Male
6. Occupation, employer and length of employment. If less than five years, briefly list jobs you have held.
7. Your level of education/degrees:
8. Marital Status:
9. Spouse's Occupation and Employer:
10. Spouse's Level of Education/Degrees:
11. If you have any children, list the number, the sex, the age, and whether they are living at home:
12. Give the occupations of your adult children and their spouses, if they are married;

13. Give the occupations of your parents and if they are retired or deceased tell us what they used to do.
14. Do you have a pet(s)? If so, list the kind of pet(s) that you have.
15. Have you, any member of your family or a close friend ever worked for Ozaukee County? ☐ Yes ☐ No

If so, when?  
What was the position held?

16. Lauren Howie Laur is the plaintiff in this case. She is represented by Attorney Kimberly Powers who works at the law firm Law Offices of Kimberly Powers in Elm Grove, Wisconsin and Also Attorney Joseph Curi from Lansing Michigan.

Have you heard of Lauren Howie Laur or members of her family?  
☐ Yes ☐ No

If your answer is "yes" to either of the questions regarding Lauren Howie Laur, or her family, please state whom you know or what you have heard and what impressions, if any, you have of her.

17. Do you know Kimberly Powers or Joseph Curi? ☐ Yes ☐ No

Have you heard of Kimberly Powers or Joseph Curi? ☐ Yes ☐ No

If your answer is "yes" to any of the questions regarding the Plaintiff's lawyers, please state whom you know or what you have heard and what impressions, if any, you have of the lawyer you know or of whom you have heard.

18. The Defendant is City of Mequon in Ozaukee County.

Do you have any impressions about Ozaukee County or Mequon Police Department? ☐ Yes ☐ No

If your answer is "yes", please state what you have heard and what impressions, if any, you have:

19. The Defendants are represented by Attorney Peter Farb in Milwaukee, WI.  
Are you familiar with Attorney Farb? ☐ Yes ☐ No

Do you know Peter Farb? ☐ Yes ☐ No

Have you heard of Peter Farb? ☐ Yes ☐ No

If your answer is “yes” to any of the questions regarding the Defendant’s lawyers, please state whom you know or what you have heard and what impressions, if any, you have of the lawyer you know or of whom you have heard.

20. Do you have or have you had any business or employment with Ozaukee County or Mequon Police Department?

☐ Yes ☐ No

If so, what experiences did you have?

Did the experience make you feel either favorable or unfavorable to Defendant?

21. Are you a relative, friend, or acquaintance of any of the employees, Supervisors, or representatives, or officials of Ozaukee County or Mequon Police Department?

☐ Yes ☐ No

If so, explain:

22. Please look at the attached list of witnesses and see if you know any of them. If so, what are the names of those you think you might know and how do you know them:

23. Please list any clubs or organizations to which you belong, or in which you participate: such as veterans groups, service clubs, professional organizations, volunteer groups, educational or political groups.

**Also describe your involvement, including any leadership positions.**

24. Please list or describe any bumper-stickers that you currently have on any vehicle that you own.

25. Please list any magazines or other print materials to which you have a subscription or which you regularly read.

26. Please list those TV or Radio programs that you watch or listen to on a regular basis.

27. Please list any Blogs or websites that you regularly visit or read.

### EXPERIENCES AND FEELINGS ABOUT COURT SYSTEM

28. Have you, anyone in your family, or close friend ever brought a civil lawsuit against anyone? ☐ Yes ☐ No

If so, describe what you claimed, what happened in the lawsuit, and whether you were satisfied with the result:

29. Have you, anyone in your family, or a close friend ever made a claim for personal injuries, discrimination, or a violation of employment laws that was not placed in suit? ☐ Yes ☐ No

If so, describe the nature of the claim, what happened, and if you were satisfied with the result.

30. Have you, or any member of your family, ever been sued by any one?

☐ Yes ☐ No

If so, describe what you were sued for, what happened and if you were satisfied with the results.

31. Have you, or has any member of your family, been accused of discriminating against someone else or violating rights of someone else? ☐ Yes ☐ No

If so, describe what you or your family member was accused of, what happened, and if you were satisfied with the results.

32. Have you ever testified as a witness in a civil law suit? ☐ Yes ☐ No

If so, describe:

33. Have you ever served on a jury before? ☐ Yes ☐ No

If so, please state when, what kind of case, the outcome, and whether nor not you were foreperson:

34. Did you reach a verdict? ☐ Yes ☐ No

35. Was your experience satisfactory? ☐ Yes ☐ No Explain:
36. Was there anything about that experience which would interfere with you hearing this case? ☐ Yes ☐ No
- If your answer was "yes", please explain:
37. Do you have any family members, relatives, or close friends who are attorneys?
- ☐ Yes ☐ No
- If so, please state who and your relationship to them and what type of work they do?
38. Does anything concern you about a citizen suing for money damages when they claim they have been injured, discriminated against, or their civil and constitutional rights have been violated?
39. Do you have any personal beliefs that there is a limit to what an individual should have as a money award, no matter what damages are proved? ☐ Yes ☐ No
- If your answer is "yes", please explain:
40. Have you formed any opinions as to the extent to which people should be compensated for violations of civil or constitutional rights laws or the amount of any such compensation?
- ☐ Yes ☐ No
- If so, please explain:
41. What are your views of the civil justice system and a jury's right to hear and decide cases concerning violation of employment laws? Please explain:

#### **PERSONAL MATTERS**

42. Do you have any specific problems at home or on the job that might make you

lose your concentration during the trial or cause you to hurry the decision-making process in the jury room? ☐ Yes ☐ No

If so, please explain:

43. Do you have any medical problems, which would impair your ability to devote full attention to this trial? ☐ Yes ☐ No

If so, explain:

44. Will the projected length of trial, which could be up to **three** days, pose any hardship to you? ☐ Yes ☐ No

If so, how?

### **JOB EXPERIENCE & ATTITUDES**

45. Do you supervise any employees? If yes, how many employees do you supervise?
46. If you have supervised employees did those responsibilities include hiring and/or termination decisions?
47. If you have had those responsibilities, have you ever terminated or disciplined an employee's employment?

48. If the answer is yes, was the termination challenged and why? What was the outcome of the challenge?

49. Have you or anyone in your family ever been terminated from work or disciplined for wrongful conduct?

☐ Yes ☐ No

If so, describe what was the reason for the termination or discipline?

Do you feel you were fairly or unfairly treated? Please explain:

50. Do you or have you or someone close to you ever owned a business or been self-employed? If yes, what type of business and who owned it.

51. Do you have any close personal friends or relatives who are managers?  
☐ Yes ☐ No

52. Has this person ever talked to you about a situation where she/he had to discipline or fire someone? ☐ Yes ☐ No

If so, provide details:

53. In a case involving a dispute between a manager and an employee, do you have any tendency to believe or find more credible the employee or the supervisor?
54. If someone is fired in violation of his or her legal rights, the employer can be held legally responsible. Do you think that is fair? ☐ Yes ☐ No Explain your answer.
55. Some people may think that lawmakers and courts have gone too far in making and enforcing laws that regulate how employees are treated on their jobs, based on age, race, sex, disability, medical leave, etc. What do you think?
56. Have you or anyone in your family ever felt that you were being treated less favorably in the workplace because of your age, race, sex, disability, medical leave, etc.  
☐ Yes ☐ No

If your answer is "yes", please explain:

57. Did you do anything about it? ☐ Yes ☐ No If so, what? If not, why not?
58. Do you feel all people, whether civilians or officers are required to follow the law?  
☐ Yes ☐ No If so, what? If not, why not?
59. Do you feel that all people should be held accountable if they do not follow the law? ☐ Yes ☐ No If so, what? If not, why not?

### CONCLUSION

59. Have you heard, read, or seen anything that is critical of people who bring lawsuits for discrimination or courts who decide the cases? ☐ Yes ☐ No

If so, please indicate what you have heard, what you agree with, what you disagree with and what you have no opinion about.

60. Is there any reason not touched upon in this questionnaire why you cannot sit objectively and listen to the evidence before making up your mind in this case?  
☐ Yes ☐ No

61. Will you follow the law the Court instructs you to follow even if you disagree?
- ☐ Yes    ☐ No
62. Do you have any feelings toward these parties, or the attorneys, or this kind of an Civil rights case, which would affect your ability to be fair and impartial? ☐ Yes    ☐ No
63. Is there anything about the nature of this case or about the people involved in it that makes you hesitate to be a juror here? ☐ Yes    ☐ No
64. Do you believe in our civil justice system that gives every person the right to be fully compensated for damages they have sustained as a result of the violation of civil rights? ☐ Yes    ☐ No
65. What additional comments do you have about being able to serve as an impartial juror in this case?

I solemnly swear every answer given by me is true and *correct, as* I verily believe.

Jury No. \_\_\_\_\_